

**United States District Court
District of Delaware**

**Pioneer Hi-Bred International, Inc. and E.I.
DuPont De Nemours and Company,**

Plaintiffs,

vs.

Syngenta Seeds, LLC

Defendant.

Case No.: 1:22-cv-01280-RGA

Jury Trial Demanded

[PROPOSED] ORDER

This ____ day of _____, 2023, it is hereby

ORDERED that Plaintiff, within 30 days of this Order, shall:

- (1) comply with the Delaware Default Standard and conduct and produce relevant documents hitting on Syngenta's requested ESI searches.
- (2) respond to Syngenta's discovery requests related to its inequitable conduct counterclaims and prior art withheld from the patent office.
- (3) produce documents related to these Requests for Production without limiting its production to documents that relate to the "methods claimed in the '846 patent."
- (4) produce documents responsive to Syngenta's Request for Production No. 115.

IT IS SO ORDERED.

Dated: _____, 2023

The Honorable Richard G. Andrews
United States District Judge